



JENNIFER M. GRANHOLM  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF ENVIRONMENTAL QUALITY  
LANSING



STEVEN E. CHESTER  
DIRECTOR

TO: Public Water Systems That Completed Security Vulnerability Assessment

FROM: James K. Cleland, Chief, Lansing Operations Division, Water Bureau

DATE: October 20, 2006

SUBJECT: CDM Michigan Inc. (CDM) Selected for Public Water Systems' (PWS) Vulnerability Assessment (VA) Capital Improvement Program (CIP) Follow-Up

**Contractor**

CDM has been selected as the contractor to assist the Water Bureau of the Department of Environmental Quality (DEQ) in implementing the PWS security program in Michigan over the next two years.

**Purpose**

The purpose of the VA CIP follow-up is to improve PWS security by implementing changes identified in the individual PWS's VA. The VA CIP follow-up contract is intended to assist the PWS in the implementation of their VA CIP and improve water security in the state.

The VA CIP follow-up contract is not a compliance assessment. All Michigan communities that were required to complete a VA complied with the Bioterrorism Act of 2002 (Act). Those PWS are being asked to participate in this program in order to determine the status of the PWS's security program and allow the state to better direct future efforts and grant funding opportunities.

**Background/History**

The Act, which amended the federal Safe Drinking Water Act, required 288 PWS in Michigan that serve a population greater than 3,300 to complete a VA of the security of their PWS. This contract is funded by the United States Environmental Protection Agency (USEPA) water sector security grant.

**Contract**

Staff from the DEQ, Water Bureau, and CDM will collect information on the implementation of capital improvements identified in the PWS VA as was required by the Act. As agreed to by the PWS in preliminary telephone contact, all PWS wishing to participate will be visited by CDM and DEQ staff. In addition to the facility site visit, all PWS will be contacted by CDM by telephone over the next two years to determine if there have been any additional updates to the initial site visit.

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### **Information Security**

Your PWS will be assigned a random number specifically for this project, and information gathered in the VA CIP follow-up will be generic in nature. Inasmuch as the VA is a secured document with your PWS and the USEPA headquarters, no VAs or copies thereof will be obtained during the site visit. No facility-specific capital improvements will be identified. Attachment A is an excerpt from the Michigan Freedom of Information Act, 1976 PA 442, as amended, which states that PWS designs and threat assessments are not subject to disclosure.

### **Schedule**

CDM and their contract partners from Michigan Rural Water Association are scheduled to assist the DEQ and the 288 PWSs in implementing their water security improvements by performing site visits for all eligible PWS by September 30, 2007. Site visit schedules will be developed and coordinated with the PWS and DEQ district offices in the upcoming months.

### **Reports**

Contract activities will be reported during the contract as well as upon the completion of the contract and will include the following:

- Number of VAs
- Number of facility site visits, date, and attendance list by position
- Number of CIP items identified by VAs
- Number of CIP items completed
- Number of CIP items remaining
- Percent of CIP items completed
- Percent of CIP items remaining
- Number of CIP items that, subsequent to VA completion, have been identified for security and have been completed

Inasmuch as this contract was just initiated on September 15, 2006, CDM is currently developing the details of VA CIP follow-up contract and more specific information will be sent out as it becomes available. You may elect to participate upon being contacted by CDM in the coming months regarding the VA CIP follow-up contract.

If you have any questions or comments, please feel free to contact Robert Babcock, Security and Emergency Response Coordinator, Lansing Operations Division, Water Bureau, at 517-373-8566 or [babcockr@michigan.gov](mailto:babcockr@michigan.gov); or Barry Sarin, CDM, at 517-702-1213 or [sarinb@cdm.com](mailto:sarinb@cdm.com).

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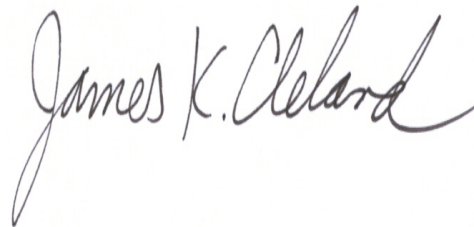
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Further public water security information is available on the DEQ, Water Bureau's Internet Web site at [http://www.michigan.gov/deq/0,1607,7-135-3313\\_23413---,00.html](http://www.michigan.gov/deq/0,1607,7-135-3313_23413---,00.html) .

Attachment

cc: Barry Sarin, CDM  
Nick Damato, USEPA  
Richard A. Powers, DEQ  
Frank J. Baldwin, DEQ  
Robert Babcock, DEQ  
Water Bureau District Supervisors, DEQ

A handwritten signature in dark ink, reading "James K. Cleland". The signature is written in a cursive style with a large, looping initial "J" and a long, sweeping underline.

**FREEDOM OF INFORMATION ACT (EXCERPT)**  
**Act 442 of 1976**

**15.243 Exemptions from disclosure; public body as school district or public school academy; withholding of information required by law or in possession of executive office.**

Sec. 13. (1) A public body may exempt from disclosure as a public record under this act any of the following:

(y) Records or information of measures designed to protect the security or safety of persons or property, whether public or private, including, but not limited to, building, public works, and **public water supply designs** (emphasis added) to the extent that those designs relate to the ongoing security measures of a public body, capabilities and plans for responding to a violation of the Michigan anti-terrorism act, chapter LXXXIII-A of the Michigan Penal Code, 1931 PA 328, MCL 750.543a to 750.543z, emergency response plans, risk planning documents, threat assessments, and domestic preparedness strategies, unless disclosure would not impair a public body's ability to protect the security or safety of persons or property or unless the public interest in disclosure outweighs the public interest in nondisclosure in the particular instance.